

ATTACHMENT 1

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

CATHERINE GAUJACQ,

Plaintiff,

V.

No. 1:05CV0969 (HHK)

ELECTRICITE DE FRANCE
INTERNATIONAL NORTH AMERICA,
INC. and

ELECTRICITE DE FRANCE, S.A. and

CHRISTIAN NADAL,

Defendants

NOTICE OF APPEAL

Notice is hereby given that Plaintiff, Catherine Gaujacq, hereby appeals to the United States Court of Appeals for the District of Columbia Circuit from the Order, dated August 21, 2008, granting summary judgment in favor of Defendants Electricite De France International North America, Inc , Electricite De France, S A , and Christian Nadal, and the August 21, 2008 final order dismissing this case.

Plaintiff further gives Notice that she is appealing to the United States Court of Appeals for the District of Columbia Circuit the absence of any ruling on her Motion for Leave to Supplement Plaintiff's Opposition to Defendants' Motions for Summary Judgment filed on March 5, 2008 and her Reply in Support of Motion for Leave to Supplement Plaintiff's Opposition to Defendants' Motions for Summary Judgment filed on March 27, 2008.

Plaintiff further gives Notice that she is appealing to the United States Court of Appeals for the District of Columbia Circuit the absence of any ruling on her Motion to Compel and for Sanctions filed on April 23, 2008 and her Reply to Defendants' Opposition to Plaintiff's Motion to Compel and for Sanctions filed on May 19, 2008.

September 10, 2008

Respectfully submitted,

/s/ ELAINE CHARLSON BREDEHOFT

Elaine Charlson Bredehoft
D.C. Bar No. 441425
Carla D. Brown
D.C. Bar No. 474097
Kathleen Z. Quill
D.C. Bar No. 489079
CHARLSON BREDEHOFT & COHEN, P.C.
11260 Roger Bacon Drive, Suite 201
Reston, Virginia 20190
(703) 318-6800
(703) 318-6808 (facsimile)

*Counsel for Plaintiff,
Catherine Gaujacq*

CERTIFICATE OF SERVICE

I hereby certify that on the 10th day of September 2008, a copy of the foregoing Notice of Appeal was filed electronically via ECF and mailed via first class mail, postage prepaid, to:

Laura B. Hoguet, Esq.
Dorothea W. Regal, Esq.
HOGUET NEWMAN & REGAL, LLP
10 East 40th Street
New York, NY 20016

*Counsel for Defendants EDF, SA
and EDFINA*

Morgan D. Hodgson, Esq.
David A. Clark, Esq.
STEPTOE & JOHNSON LLP
1330 Connecticut Avenue, N.W.
Washington, D C. 20036

Counsel for Defendant Christian Nadal

/s/ ELAINE CHARLSON BREDEHOFT

Elaine Charlson Bredehoft
D.C. Bar No. 441425
Carla D. Brown
D.C. Bar No. 474097
Kathleen Z. Quill
D.C. Bar No. 489079
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*Counsel for Plaintiff,
Catherine Gaujacq*

ATTACHMENT 2

PLATT & DAWSON, INC.Attorney Rate Schedule
January 25, 2006

Regular Attendance Rates			
10:00 am -1:00 pm	\$150.00	1:00 pm - 5:00 pm	\$200.00
10:00 am -2:00 pm	\$200.00	2:00 pm - 5:00 pm	\$150.00
10:00 am - 5:00 pm	\$300.00	3 hours (before 5:00 pm)	\$150.00
Before 5 p.m.: \$25 per half hour/\$50 per hour (after 3 hours)			
After 5 p.m.: \$38 per half hour/\$75 per hour			
After midnight: \$50 per half hour/\$100 per hour			
Minimum Attendance: \$150.00 (up to 3 hours)			
En route cancellation: \$100.00			
Court: Attendance plus pages			
When a deposition not transcribed is ordered within 30 days, the attendance fee is applied to the cost.			
SATURDAY/ SUNDAY/ HOLIDAY ATTENDANCE RATES			
(Holidays: New Years Day, President's Day, Memorial Day, July 4th, Labor Day, Thanksgiving Day and Christmas)			
Court: Regular attendance rate x 1.5			
Depositions: Regular attendance plus pages			
Depositions not transcribed: Regular attendance rate x 1.5			
Transcript Page Rates			
	Original + Copy		Copy*
Regular	3.80		2.00
Semi-expedite (6-9 working days)	4.00		2.20
5-day or Panel or Committee (under 10)	4.50		2.35
4-day	5.00		2.60
3-day/Public Hearing	5.50		2.85
2-day	6.00		3.10
Daily	6.50		3.35
Same day	8.75		4.40
Medical (difficult) or video	+0.30		+0.15
Draft Deposition	1.00		1.00
Draft court- same day	1.25		1.25
Draft court- not same day	1.00		1.00
Draft with difficult medical	+.25		+.25
*Second copy rate to same attorney: .25 per page			

Uncontested minimum (5 day delivery): \$150.00

Daily transcript minimum: \$175.00

Waiting time over one-half hour: \$25 per half hour

Deposition with interpreter: Pages plus one-half of the hourly rate

Transcribing tapes: Pages plus hourly rate

Miscellaneous

Receipt/ mailing of subpoenaed records: \$30.00 plus postage

ASCII disk: \$10.00

Exhibit copies: 20 per page regular/ 25 per page legal

Video rates upon request.

2nd copy
rate to
rptr should
be .12 all
rptr sheet

ATTACHMENT 3

Kathy Baker

From: Karina Gukasian-Hunt [kgukasian@trustfortelanguages.com]
Sent: Thursday, September 18, 2008 12:04 PM
To: Kathy Baker
Subject: RE: Invoices
Attachments: TFL price list-2008.doc
TimeMattersID: MD9229B36B21A615
TM Contact: Catherine Gaujacq
TM Matter No: 690
TM Matter Reference: Gaujacq, Catherine

Hi Kathy,

The regular translation prices for these documents would have been as follows:

nvoice 250682	\$120
nvoice 251211	\$120
nvoice 251299	\$85
nvoice 255236	\$35

I am also attaching our price list.
Please let me know if you have any questions.
Thank you,

Karina Gukasian-Hunt
/ P. Special Projects
Trustforte Language Services
271 Madison Avenue, 3rd Floor
New York, NY 10016
☎: 212-481-4980
☎: 212-683-4801
kgukasian@trustfortelanguages.com
www.trustfortelanguages.com

From: Kathy Baker [mailto:kbaker@cbc-law.com]
Sent: Thursday, September 18, 2008 11:53 AM
To: info@trustfortelanguages.com
Subject: Invoices

Good morning, Karina,

Per our telephone conversation a few minutes ago, I am attaching copies of four invoices which date back to October 2006 and December 2006. I would appreciate your advising me for each invoice what the charge(s) would be regular (vs. rush or expedited or next day) service with respect to your rates back in 2006, as soon as possible.

Thank you very much for your assistance. Please feel free to contact me should you have any questions.

Kathy Baker

09/19/08

Kathryn McBride Baker
Paralegal
Charlson Bredehoff & Cohen, P.C.
1260 Roger Bacon Drive, #201
Reston, Virginia 20190
703) 318-6800

ATTACHMENT 4

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

CATHERINE GAUJACQ,

Plaintiff,

v.

ELECTRICITÉ DE FRANCE, S.A.,
ELECTRICITÉ DE FRANCE
INTERNATIONAL NORTH AMERICA,
INC., et al.,

Defendants.

No. 1:05CV0969 (JGP)

NOTICE OF BULKY EXHIBITS

Pursuant to the procedures for filing documents electronically, exhibits 1 through 96, which are the attachments to Defendants' Statement Pursuant to FRCP 56.1 and Local Rule 7(h), are in paper form only and are being maintained in the case file in the Clerk's Office. These documents will be available for public viewing and copying between the hours of 9:00 a.m. to 4:00 p.m., Monday through Friday.

NANCY MAYER-WHITTINGTON

Clerk

October 16, 2006

ATTACHMENT 5

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

CATHERINE GAUJACQ,

Plaintiff,)

$$V_{..}$$

No. 1:05CV0969 (JGP)

ELECTRICITÉ DE FRANCE, S.A.,)
ELECTRICITÉ DE FRANCE)
INTERNATIONAL NORTH AMERICA,)
INC., et al.,)

Defendants.)

NOTICE REGARDING FILING OF SEALED MATERIAL

Notice is given that a portion of Exhibit F (an attachment to the Declaration of Patrick De Botherel), and Exhibits 27, 30 and 60, (attachments to Defendants' Statement Pursuant to FRCP 56.1 and Local Rule 7(h)), together with their translations have been filed as Sealed Attachments in paper format with the Court. These documents are not available for public viewing.

NANCY MAYER-WHITTINGTON

Clerk

October 16, 2006

ATTACHMENT 6

Page 1

In the U.S. District Court
For the District of Columbia

-----x
Catherine Gaujacq :
: NO. 1:05CV0969
v. :
:
Electricite de France :
International, North :
America, et al :
-----x

March 16, 2006

DEPOSITION OF:

Catherine Gaujacq,
a witness, called by counsel pursuant to notice,
commencing at 9:30 a.m., which was taken at 11260
Roger Bacon Drive, Reston, VA

Appearances

Elaine C. Bredehoft, Esq.

Charlson, Bredehoft and Cohen

11260 Roger Bacon Drive

Reston, VA 20190

for the Plaintiff

Laura B. Hogeut, Esq.

Steptoe and Johnson

1330 Connecticut Ave., NW

Washington, DC 20036-1795

for the Defendant

In the U.S. District Court
For the District of Columbia

-----x
Catherine Gaujacq :
 : NO. 1:05CV0969
 v. :
 :
 Electricite de France :
 International, North :
 America, et al :
-----x

March 17, 2006

DEPOSITION OF:

Catherine Gaujacq (Cont'd)

a witness, called by counsel pursuant to notice,
commencing at 8:41 a.m., which was taken at 11260
Roger Bacon Drive, Reston, VA

Appearances

Elaine C. Bredehoft, Esq.

Charlson, Bredehoft and Cohen

11260 Roger Bacon Drive

Reston, VA 20190

for the Plaintiff

Laura B. Hogeut, Esq.

Steptoe and Johnson

1330 Connecticut Ave., NW

Washington, DC 20036-1795

for the Defendant

COPY

566

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

-----X
:
CATHERINE GAUJACQ, :
:
Plaintiff, :
:
vs. : 1:05CV0969 (JGP)
:
ELECTRICITE DE FRANCE :
INTERNATIONAL NORTH AMERICA, INC , :
et al , :
:
Defendants :
:
-----X

Washington, D.C

Friday, June 2, 2006

Continuing deposition of CATHERINE GAUJACQ, called
for examination by counsel for the defendants,
pursuant to notice, at the office of Steptoe &
Johnson, LLP, 1330 Connecticut Avenue, N.W ,
Washington, D.C., before Laurel P Platt, a Registered
Diplomate Reporter, and Fada S Chaconas, a notary
public in and for Washington, D.C., beginning at 8:37
a.m., when were present on behalf of the respective
parties:

Page 567

Page 569

FOR THE PLAINTIFF:

ELAINE CHARLSON BREDEHOFT, ESQ
 Charlson, Bredehoft & Cohen P C
 11260 Roger Bacon Drive
 Suite 201
 Reston, Virginia 20190

FOR THE DEFENDANT CHRISTIAN NADAL:

MORGAN D HODGSON, ESQ
 DAVID A CLARK, ESQ,
 Steptoe & Johnson, LLP
 1330 Connecticut Avenue, N W
 Washington, D C 20036
 202-429-3000

FOR THE DEFENDANTS ELECTRICITE DE FRANCE, S A. AND
ELECINICITE DE FRANCE INTERNATIONAL NORTH AMERICA:

DOROTHEA W REGAL, ESQ
 Hoguet, Newman & Regal, LLP
 10 East 40th Street
 New York, New York 10016
 212-689-8808

PROCEEDINGS

Whereupon,

CAIHERINE GAUJACQ,

plaintiff, was called for examination by counsel for
 the defendants, and after having been first duly
 sworn, was examined and testified as follows:

EXAMINATION BY COUNSEL FOR THE DEFENDANT

CHRISTIAN NADAL

BY MS HODGSON:

Q Good morning, Ms Gaujacq My name is Morgan
 Hodgson. I am with Steptoe & Johnson. I represent
 Defendant Christian Nadal, and I am going to be
 examining you on behalf of all defendants, and then
 Ms Regal will ask whatever additional questions she
 may wish to ask you this morning, also on behalf of
 all defendants. You understand that this a
 continuation of your deposition.

A Yes

Q And you understand that you are under oath --

A I do

Q -- and what that means.

A Yes

Page 568

Page 570

INDEX

EXAMINATION BY COUNSEL FOR
THE DEFENDANTS:

WITNESS	MR NADAL,	EDF, EDFINA,
	MS HODGSON	MS REGAL

Catherine Gaujacq	569	690
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EXHIBITS

CAIHERINE GAUJACQ FOR IDENTIFICATION

No 89 (Catherine Gaujacq s resume)	576
No 90 (3/1/05 offer letter)	589
No 91 (Employee Pay Stub Image)	595
No 92 (Entergy benefits form)	609
No 93 (chronology of events)	630
No 94 (Simulation de pension)	661
No 95 (IRS 2004 Form 1040)	675
No 96 (IRS 2005 tax forms)	675
No 97 (4/15/06 check copy)	690
No 98 (copy of passport pages Bates 2529 through 2532)	697
No 99 (passport copy)	717

Q I'd like to ask you some questions initially
 about your departure from EDF. Okay?

A Okay.

Q Who is Jeff Wheelock?

A I mean --

Q Does that name ring a bell?

A Not really.

Q Did you ever speak to somebody who was the
 human resources director at IMPO?

A Yes, I do

Q Does that refresh your recollection that you
 might have spoken to a man named Jeff Wheelock?

A I mean, no. Honestly, no. I spent a few
 hours with human resources people at IMPO, and you
 tell me Jeff Wheelock was at IMPO or he's at IMPO
 You say it. I don't recall.

Q When did you meet with human resources
 representatives at IMPO?

A I had one interview about opportunities of
 employment in the nuclear industry at IMPO at the end
 of October of 2004.

Q And that took place in Atlanta?